



GIBNEY
ANTHONY &
FLAHERTY LLP

Attorneys at Law
665 Fifth Avenue
New York, NY 10022
212.688.5151
212.688.8315 Fax
www.gibney.com

John Macaluso
212.705.9837 Direct
jmacaluso@gibney.com

April 1, 2019

Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: Rolex Watch U.S.A., Inc. v. Jose Gallarreta, et al. Case No. 18-cv-11138

Dear Judge Furman:

This firm represents Plaintiff Rolex Watch U.S.A., Inc. ("Rolex") in the above-referenced action.

We write regarding the Court's March 29, 2019 Order Scheduling Default Judgment Briefing and Show Cause Hearing (the "March 29, 2019 Order"). The March 29, 2019 Order required Plaintiff to serve on Defendant "via overnight courier (1) with a copy of this Order within one business day of the date of this Order; and (2) with a copy of the motion for default judgment and all supporting papers within one business day of the date of any such motion."

On February 25, 2019, the Court entered an order permitting service of the "Summons and Complaint and other documents on file in connection with this matter" via the two email addresses associated with Defendant's www.rolextracker.com website, namely info@rolextracker.com and golden.house.invest@gmail.com (the "February 25, 2019 Order"). As detailed in Plaintiff's motion papers and the Declaration of Brian Brokate (Docket No. 14, ¶¶ 9-10), service via email was necessary because the physical address in Uruguay the Defendant

San Francisco Office: 201 California Street, Suite 350, San Francisco, CA 94111 tel 415.901.2270

Associated Offices: Gros & Walsenspuhl, Rue Beauregard 9, CH-1204 Geneva, Switzerland tel +41 22.311.3833
Magrath LLP, 66/67 Newman Street, London, W1T 3EQ, United Kingdom tel +44 207.495.3003



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provided to the registrar when he registered the www.rolextracker.com domain is not a location where Defendant resides or works.

Therefore, Plaintiff respectfully requests that the Court permit Plaintiff to serve the March 29, 2019 Order, any default judgment motion papers, and any other papers to be served on Defendant in this matter via email to info@rolextracker.com and golden.house.invest@gmail.com.

Respectfully submitted,

GIBNEY, ANTHONY & FLAHERTY, LLP

By: /s/ John Macaluso

John Macaluso

665 Fifth- Avenue

New York, New York 10022

Telephone (212) 688-5151

Facsimile (212) 688-8315

E-mail: jmacaluso@gibney.com

Counsel for Plaintiff, Rolex Watch U.S.A., Inc.

cc:

info@rolextracker.com;

golden.house.invest@gmail.com